

MEMO ENDORSED



Handley Farah & Anderson PLLC

October 8, 2021

Via ECF

United States District Judge Sidney H. Stein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Housing Rights Initiative v. Compass, Inc. et al., Case No. 21-cv-2221

Dear Judge Stein:

We represent Plaintiff Housing Rights Initiative in the above-referenced matter. I write to request a postponement of the Status Conference, currently scheduled for October 15, 2021 at 9:30 AM, to a date after October 20, 2021. Plaintiff makes this request because it believes it would be more judicially efficient for the Status Conference to occur after the deadline for defendants to answer or otherwise respond to the Complaint has passed.

On March 15, 2021, the Complaint in this civil action was filed, naming eight-eight (88) entities as Defendants. All Defendants have been served. On May 14, 2021, the Court extended the deadline for all defendants to answer or move in response to the Complaint to August 20, 2021. Dkt. No. 109. On June 14, 2021, the Court set an initial conference for September 14, 2021. Dkt. No. 134. On August 16, the Court granted Plaintiff's request to extend the deadline for defendants to respond or otherwise move to September 20, 2021 and rescheduled the initial conference to October 15, 2021. Dkt. No. 154. On September 17, 2021, after receiving requests from several defendants, the Court extended the date for all defendants to answer or otherwise respond to the Complaint to October 20, 2021. Dkt. No. 198.

Plaintiff has resolved its claims against five Defendants, and is in discussions with over twenty other defendants to attempt to resolve its claims against them. Plaintiff anticipates that some of these claims will be resolved prior to October 20, 2021.

Plaintiff submits that postponement of the scheduling conference until after the date responses to the Complaint are due will allow the parties and the Court to more efficiently discuss an appropriate schedule for this civil action.

Plaintiff has reached out to all counsel that have appeared regarding the request to postpone the Status Conference.

Counsel for the following Defendants have stated they consent to the request:

- 65 Bergen LLC
- 41-42 Cambridge Owners Corp
- Prospect Owners Corp.
- 348 East 62nd LLC
- Eva Management LLC
- 165th St. Realty, LLC
- MTY Group, Inc.
- Paley Management Corp.
- GIM Realty LLC
- Home By Choice LLC
- E Realty International Corp.
- Maz Group NY LLC
- Eric Goodman Realty Corp.
- Saldo Properties, LLC
- Tenth Manhattan Corp.
- FirstService Realty NYC, Inc.
- PD Properties LLC
- 165 Hester
- The Stratford, LLC
- Peter Chris Meskouris
- Hell's Kitchen, Inc.
- M Q Realty, LLC
- Compass, Inc.
- Chandler Management, LLC

Counsel for the following Defendants have stated they do not oppose the request:

- 83rd Street Associates LLC
- Bold LLC
- Myerowitz/Satz Realty Corp.
- Atias Enterprises Inc.
- Park Row (1st Ave.) Ltd.
- Rosa Mangiafridda
- Lions Gate New York LLC
- Lande Realty 2010, LLC
- John O'Kelly Real Estate Inc.
- Alexander Hidalgo Real Estate, LLC
- East 89th Associates, LLC
- Jackson Ht. Roosevelt Development II, LLC

- Urban Real Estate Property Group
- Wegro
- Corcoran Group LLC
- 1380 First Owners Co. L.P.

Plaintiff's counsel has not received a position from the following Defendants:

- Voro LLC
- 931-955 Coney Island Ave. LLC
- 3Localtion3.Co Realty, LLC

No Defendant has informed Plaintiff of an objection to this request.

Defendant Home By Choice has consented and also requested the status conference not occur between the dates of October 27, 2021 and November 1, 2021.

Plaintiff therefore respectfully requests that Status Conference currently scheduled for October 15, 2021 be postponed to a date after October 20, 2021.

Thank you for your consideration.

Respectfully,

/s/ Matthew Handley

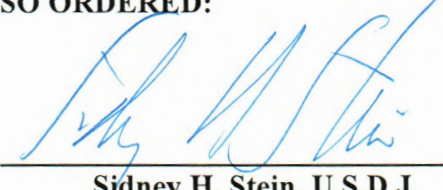
Matthew Handley

cc: All counsel of record (via ECF)

The conference is adjourned to December 1, 2021, at 10:00 a.m.

**Dated: New York, New York
October 7, 2021**

SO ORDERED:



Sidney H. Stein, U.S.D.J.